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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NINGBO MIZHIHE I&E CO., LTD,

Plaintiff,

v.

DOES 1-200; DRESHOW; 4MEMORYS;
DENG KAI, ET AL.

Defendants.

C.A. No. 19-CV-6655-AKH

NOTICE OF MOTION FOR SANCTIONS AGAINST DEFENDANTS

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of Its Motion for Sanctions under Federal Rule of Civil Procedure 37 and the Court's inherent power, and upon all prior proceedings herein, Plaintiff/Counterclaim Defendant, through its counsel, Greenberg Traurig, LLP, will move this Court at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 14B, New York, New York 10007 before Alvin K. Hellerstein, United States District Judge, at a date and time to be directed by the Court for an order sanctioning Defendants for their failure to comply with their obligations under this Court's discovery orders and the Federal Rules of Civil Procedure.

This motion should be granted for the reasons set forth in the accompanying Memorandum of Law, any supporting, opposing, or reply papers which may be filed, and such other arguments and evidence that may be brought before the Court.

The motion will be briefed in accordance with the following briefing scheduled set by Civil Rule 6.1(a) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York:

- Moving papers filed January 14, 2021;
- Answering papers must be filed no later than January 21, 2021;
- Reply papers must be filed by January 25, 2021.

Dated: January 14, 2021

GREENBERG TRAURIG LLP

/s/ Jonathan D. Ball

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